

1 JOHN R. BAILEY
2 Nevada Bar No. 0137
3 DENNIS L. KENNEDY
4 Nevada Bar No. 1462
5 JOSHUA P. GILMORE
6 Nevada Bar No. 11576
7 PAUL C. WILLIAMS
8 Nevada Bar No. 12524
9 STEPHANIE J. GLANTZ
10 Nevada Bar No. 14878
11 **BAILEY♦KENNEDY**
12 8984 Spanish Ridge Avenue
13 Las Vegas, Nevada 89148-1302
14 Telephone: 702.562.8820
15 Facsimile: 702.562.8821
16 JBailey@BaileyKennedy.com
17 DKennedy@BaileyKennedy.com
18 JGilmore@BaileyKennedy.com
19 PWilliams@BaileyKennedy.com
20 SGlantz@BaileyKennedy.com

21 *Attorneys for Plaintiff/Counterdefendants*
22 *TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,*
23 *and Rowen Seibel*

24 UNITED STATES DISTRICT COURT
25 DISTRICT OF NEVADA

26 TPOV ENTERPRISES 16, LLC, a Delaware
27 limited liability company,

28 Plaintiff,

vs.

29 PARIS LAS VEGAS OPERATING COMPANY,
30 LLC, a Nevada limited liability company,

31 Defendant.

32 PARIS LAS VEGAS OPERATING COMPANY,
33 LLC, a Nevada limited liability company,

34 Counterclaimant,

35 vs.

36 TPOV ENTERPRISES, LLC, a Delaware limited
37 liability company, TPOV ENTERPRISES 16,
38 LLC, a Delaware limited liability company,
39 ROWEN SEIBEL, an individual,

40 Counterdefendants.

41 Case No. 2:17-cv-00346-JCM-VCF

42 **STIPULATION AND ORDER TO EXTEND
43 BRIEFING SCHEDULES ON:**

44 **(1) PARIS LAS VEGAS OPERATING
45 COMPANY, LLC'S MOTION TO
46 AMEND DEFAULT JUDGMENT AND
47 MOTION FOR ATTORNEYS' FEES AND
48 COSTS [ECF Nos. 233, 234]; AND**

49 **(2) COUNTERDEFENDANT TPOV
50 ENTERPRISES, LLC'S MOTION TO
51 SET ASIDE ENTRY OF DEFAULT
52 JUDGMENT; OR, IN THE
53 ALTERNATIVE, MOTION TO ALTER
54 OR AMEND DEFAULT JUDGMENT
55 [ECF Nos. 239, 240]**

56 **(THIRD REQUEST)**

1 Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC (“TPOV
2 16”); Counterdefendant TPOV Enterprises, LLC (“TPOV”); Counterdefendant Rowen Seibel
3 (“Seibel”) (collectively, “Seibel and the TPOV Entities”); and Defendant/Counterclaimant Paris
4 Las Vegas Operating Company, LLC (“Paris”) (collectively, the “Parties”) stipulate and agree as
5 follows:

6 1. On August 10, 2020, Paris filed a Motion to Amend Default Judgment [ECF No.
7 233] and Motion for Attorneys’ Fees and Costs [ECF No. 234]. On September 4, 2020, Seibel and
8 the TPOV Entities filed its response [ECF No. 248]. Currently, Paris’s deadline to file its reply is
9 September 11, 2020.

10 2. On August 10, 2020, TPOV filed a Motion to Set Aside Entry of Default Judgment
11 [ECF No. 239] or, in the Alternative, Motion to Alter or Amend Default Judgment [ECF No. 240].
12 On September 4, 2020, Paris filed its response [ECF No. 247]. Currently, TPOV’s deadline to file
13 its reply is September 11, 2020.

14 3. Paris’s deadline to file its reply in support of its Motion to Amend Default Judgment
15 [ECF No. 233] and Motion for Attorneys’ Fees and Costs [ECF No. 234] shall be extended by
16 seven (7) days, from September 11, 2020, to September 18, 2020.

17 4. TPOV’s deadline to file its reply in support of its Motion to Set Aside Entry of
18 Default Judgment [ECF No. 239] or, in the Alternative, Motion to Alter or Amend Default
19 Judgment [ECF No. 240] shall be extended by seven (7) days, from September 11, 2020, to
20 September 18, 2020.

21 5. Good cause exists to extend the briefing schedules as set forth above to
22 accommodate the schedules of counsel.

23 ///

24 ///

25 ///

26 ///

27 ///

28

BAILEY♦KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89143-1302
702.562.8820

1 6. This is the third request to extend the briefing schedules of the motions set forth
2 above [see ECF Nos 244, 246] and is made in good faith and not for the purpose of delay.

3 Dated this 11th day of September, 2020.

Dated this 11th day of September, 2020.

4 BAILEY♦KENNEDY

PISANELLI BICE PLLC

5 By: /s/ Paul C. Williams

JOHN R. BAILEY
DENNIS L. KENNEDY
JOSHUA P. GILMORE
PAUL C. WILLIAMS
STEPHANIE J. GLANTZ

6 *Attorneys for Plaintiff/Counterdefendants*
7 *TPOV Enterprises, LLC, TPOV Enterprises*
8 *16, LLC, and Rowen Seibel*

5 By: /s/ Debra L. Spinelli

JAMES J. PISANELLI
DEBRA L. SPINELLI
M. MAGALI MERCERA
BRITTNIE T. WATKINS
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
JJP@pisanellibice.com
DLS@pisanellibice.com
MMM@pisanellibice.com
BTW@pisanellibice.com

6 *Attorneys for Defendant/Counterclaimant*
7 *Paris Las Vegas Operating Company, LLC*

13 IT IS SO ORDERED.

14 
15 UNITED STATES DISTRICT JUDGE

16 September 11, 2020

17 DATED: _____

20 Respectfully submitted by:

21 BAILEY♦KENNEDY

22 By: /s/ Paul C. Williams

23 JOHN R. BAILEY
24 DENNIS L. KENNEDY
25 JOSHUA P. GILMORE
26 PAUL C. WILLIAMS
27 STEPHANIE J. GLANTZ

28 *Attorneys for Plaintiff/Counterdefendants*
29 *TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,*
30 *and Rowen Seibel*